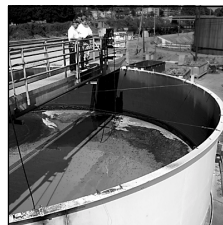


Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the King County Industrial Waste Program



King County
Wastewater Treatment Division
Industrial Waste Program

Volume XXVII Issue 1 March 2004

Mission Statement

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

Industrial Waste Advisory Committee

Kevin Burrell,

Environmental Coalition of South
Seattle (ECOSS)

Ken Gross, GM Nameplate

Sandy Hallberg, Asko Processing

Scott Woerman, North Creek Analytical

Donna Hoskins, Berlex Laboratories

Bill Hughes, Circuit Partners

Mike Jeffers, Envirotech Systems

Kim Niino, Safeway Distribution Center

Tom Raymond, Honeywell, Inc.

Steve Skodje, Cargill, Inc.

Doris Turner, Boeing Commercial

Airplane Group- Renton

Chris VanHoof, City of Kent

KCIW Announces Award Winners in the 2003 Rewards and Recognition Program

Each year the King County Industrial Waste Program (KCIW) recognizes significant industrial users (SIUs) of the sewer system that have maintained an excellent record of compliance with rules and regulations for the previous calendar year.

Congratulations!

This year KCIW honors significant industrial users with the following awards: EnvirOvation, Commitment-to-Compliance, Gold Certificate and Silver Certificate. **EnvirOvation Award** winner(s) will be announced in King County Earth Month (April) and will be highlighted in the June edition of this newsletter.

KCIW's **Commitment-to-Compliance Award** honors industrial users that have received a Gold Certificate (see below) for five consecutive years. 2003 winners are the Kenworth Truck Company and the Weyerhaeuser Company.

KCIW congratulates the 52 Gold Award recipients. To win the **Gold Award**, an SIU must have discharged wastewater during a minimum of 12 months of the calendar year from at least one of its sites and have no violations of any kind, including; discharge; permit; ordinance; reporting; self-monitoring; or King County monitoring.

This year the **Silver Award** recognizes the performance of 22 SIUs that have had no King County monitoring violations, but have had a limited number of self-monitoring violations.

If you have any questions about the Rewards and Recognition Program, please call KCIW's Kristin Painter at 206-263-3002.



The Kenworth W900L, one of North America's most recognized Class 8 trucks, is manufactured at the Kenworth Truck Company plant in Renton, winner a of 2003 Commitment-to-Compliance Award.

Inside this Issue

- 2003 Award Winners
- KCIW News: CWT regulations revised;
- IWAC advisory committee meets
- Industrial Pretreatment Tips: Submitting self-monitoring data
- Ecology's TREE Program offers technical assistance
- Industrial Waste fees are set for 2004

KCIW News Briefs

Centralized Waste Treatment (CWT) Regulations revised:

On December 22, 2003, with the revisions effective the same date, the Environmental Protection Agency (EPA) amended certain provisions of a wastewater discharge regulation for the Centralized Waste Treatment (CWT) Point Source Category. The action:

- deleted selenium limitations and standards from certain sections of Subpart A, the Metals Treatment and Recovery subcategory;
- deleted the barium, molybdenum, antimony, and titanium limitations and standards from Subpart B, the Oils Treatment and Recovery subcategory;
- deleted the molybdenum, antimony, aniline, and 2,3 dichloroaniline limitations and standards from the Organics Treatment and Recovery subcategory;
- revises all applicable related sections of Subpart D, the Multiple Wastestream subcategory, to reflect the preceding revisions.

This action affects approximately four Significant Industrial Users in the county.

(A longer article on the topic is published at <http://dnr.metrokc.gov/wlr/indwaste/news.htm> on the Internet. Or for a print copy call our offices at 206-263-3000 or email: kristin.painter@metrokc.gov.

February Meeting, Industrial Waste Advisory Committee (IWAC)

The meeting included:

Announcements

1. Overview of Industrial Waste (IW) Program
2. Technical Assistance Seminar Topics
3. Signature Authority Delegation Process
4. Tour of North Creek Analytical Laboratory

The next meeting will be at 9:00 a.m., May 5, 2004 at 130 Nickerson Street, Suite 105, Seattle, WA 98109. Agenda to be determined. The meeting site is wheelchair accessible.

People who have needs or disabilities for which arrangements must be made ahead of time should contact KCIW at 206-263-3000 (voice) or the Wa. Relay Service at 1-800-833-6388 or email kristin.painter@metrokc.gov.

(You can read these minutes in full at <http://dnr.metrokc.gov/wlr/indwaste/publicat.htm> on the KCIW Web pages.

Or call 206-263-3000 for a copy.)



The King County Industrial Waste Program salutes the 2003 Rewards and Recognition Program Awardees

(Awarded in 2004 and listed here throughout that year)

Commitment-to-Compliance Award

Kenworth Truck Company
Weyerhaeuser Company

Gold Award

Acu-Line Corporation
Alaskan Copper Works – 6th Ave.
Avtech Corporation
B.S.B. Diversified Company
Ball Metal Beverage Container Corp.
Boeing Commercial Airplane – North Field
Boeing Commercial Airplane – Renton
Boeing Electronics Center
BP-Arco Petroleum
Burlington Environmental
Burlington Northern/Santa Fe Railroad Company
Carnitech US, Inc.
Color Tech
Crane-Eldec Corporation – Martha Lake Facility
Davis Wire Corporation
Emerald Sanitary Services LLC
Glacier Northwest
GM Nameplate, Inc.
Honeywell International, Inc.
Industrial Container Services, Inc.
Industrial Plating Corporation
Island Spring, Inc.
Kenworth Truck Company
King County CIP – Henderson/MLK CSO
Marco Shipyard Seattle, Inc.
Mastercraft Metal Finishing, Inc.
Mikron Industries
Northstar Beverage Company
Pacific Iron & Metal
Pepsi-Cola Company
Philip Environmental Services Corp.

Precor USA – Plant 1
 Precor USA – Plant 2
 Protective Coatings, Inc.
 Prototron Circuits, Inc.
 Puget Sound Energy
 Rexam Beverage Can Company
 Safeway, Inc. – Beverage Plant
 Seattle FilmWorks Manufacturing /
 PhotoWorks, Inc.
 Seattle Solid Waste –
 Kent Highlands Landfill
 Skills, Inc. (Ballard)
 Smith Fabrication, Inc.
 Surftex Finishes Company
 Time Oil Company
 Tri-Way Industries
 Universal Brass, Inc.
 Universal Sheet Metal, Inc.
 Vectra Fitness
 Viox Corporation
 Western Metal Arts
 Western Pneumatic Tube
 Weyerhaeuser Company

Silver Award

Aero Controls, Inc. – 20th Street NW
 Aerojet – General Corporation
 Amgen Corporation
 Cedar Grove Composting, Inc.
 Circuit Partners, Inc.
 Circuit Services WorldWide LLC
 Costco Wholesale
 Crane-Eldec Corporation –
 North Creek Facility
 Emerald Recycling
 Exotic Metals Forming Company
 Interstate Brands Corporation – Hostess
 Kerry, Inc.
 King County CIP – Denny Way CSO/
 Mercer Tunnel
 King County Solid Waste –
 Cedar Hills Landfill
 Magnetic and Penetrant Services Co.
 Philips Ultrasound, Inc.
 Puget Sound Recycling
 Quality Finishing, Inc.
 Rabanco Recycling Company
 Skills, Inc.
 TTM Technologies, Inc.
 Universal Manufacturing, Inc.

Industrial Pretreatment Tips

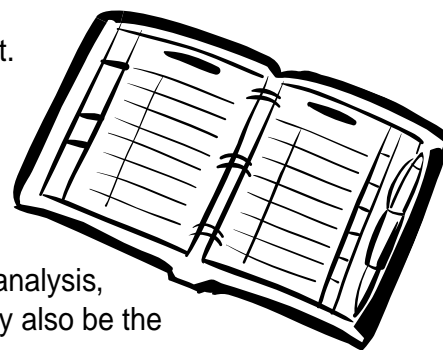
Submitting self-monitoring data

A County-issued fine for Fuji Photo Processing Inc. is cited on page 7. The fine reflects the importance that KCIW places upon industries' accurate self-reporting of routine monitoring. While some pretreatment programs directly collect all compliance samples for analysis and reporting, KCIW has each company collect routine samples in-house and report these results to us. (Companies may realize savings by having their own personnel collect the samples and by negotiating analysis fees with a Washington State accredited laboratory.) For this type of program to be effective KCIW must be assured that the data collected and reported through self-monitoring is accurate.

To ensure that the reports are accurate, King County requires that an authorized representative of the company sign a statement certifying a) the documents were prepared under his or her direction or supervision, b) there is a system in place designed to assure that qualified personnel properly collect the samples and record the results, c) these people were directly asked that the information submitted is truthful and complete and d) they are aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The following are some tips that you can use in the development of a system that will help your business avoid potentially costly reporting violations:

- Read and understand your permit. Employees responsible for sample collection and reporting should also have read and understand permit requirements.
- Designate one person to oversee sample collection, shipping and analysis, and report submittal. That person may also be the delegated signatory authority.
- Make sure all persons responsible for sample collection, shipping, or reporting know how to properly fill out and understand a "Chain of Custody" form. Your lab should be able to provide you with a blank form to use. Periodically review the chain of custody forms and make sure they agree with the information that is recorded on the self-monitoring report form.
- Have the laboratory submit data directly to the person responsible for signing the form. Many laboratories can send the reports via e-mail as a file attachment. You can then disburse the reports to the individual responsible for preparing the final report. If this is not feasible on a routine basis, periodically check original reports against the self-monitoring form. Develop a filing system and maintain all records for at least three years or longer if required by the County.



Ecology's TREE Program offers technical assistance

Washington State Department of Ecology's Technical Resources for Engineering Efficiency (**TREE**) Program provides free, in-depth technical assistance to industrial facilities throughout the state. The **TREE** team is made up of Ecology engineers and scientists with expertise in industrial processes and pollution prevention. **TREE** uses research, process modeling and engineering analysis to find ways to reduce waste while saving money. The team mainly specializes in:

- Hazardous Waste Reduction
- Wastewater Reduction
- Solid Waste Reduction
- Water Use Optimization
- Chemical Usage Optimization
- Energy Use Optimization



TREE team measuring the pH and conductivity of a recycled water stream.

TREE works with one business at a time to provide high intensity, long duration technical assistance. A typical project lasts between four to five months.

TREE projects are non-regulatory. Information obtained during a project cannot be used in enforcement. The team does offer compliance suggestions and will point out potential environmental compliance violations to facility management.

How has TREE successfully worked with companies?

Since its inception in 1998, the **TREE** team has worked with 15 facilities throughout the state. **TREE** has made suggestions that could:

- save companies a total of \$970,000 each year,
- reduce wastewater generation by 159 million gallons annually,

- reduce hazardous waste generation by 229,000 pounds each year,
- reduce solid waste generation by 119 tons each year, and
- reduce chemical usage by 200,000 pounds per year.

The **TREE** team selects a facility where there is:

- potential to reduce the environmental affect of the facility,
- potential to improve process efficiently and reduce waste,
- willingness to work in good faith with the **TREE** team,
- willingness to implement system changes where economically feasible,
- minimal in-house engineering staff, and/or
- minimal experience with pollution-prevention implementation.

Working with a company:

If **TREE** selects your facility for assistance, the team will make several visits to gather information about your processes and document its findings in a report. The facility report (confidential if preferred) includes specifics on reducing waste generation and resource consumption, and increasing savings. The facility decides whether or not to implement these pollution prevention opportunities.

For more information or to apply please contact James DeMay at (360) 407-6338 or by email at jade461@ecy.wa.gov. Or visit: <http://www.ecy.wa.gov/programs/hwtr/TREE> on the Internet.



TREE team measuring the wastewater sump of a facility.

Spot Light: TREE Project with Skills Inc.

In the fall of 2001, the TREE team partnered with Skills, Inc in Seattle (Ballard area) to find ways to optimize their facility processes. A large percentage of Skills employees are individuals with a range of disabilities who are involved in a variety of finish processes mainly for the local aerospace industry. Skills processes over 250,000 parts per month in their Seattle plant.

Implementation of the opportunities identified in TREE's report focused on reducing Skills generation of wastewater and hazardous waste. Calculated potential savings included:

- reducing hazardous waste by over 32,000 pounds each year,
- reducing wastewater generated by 1.6 million gallons per year,
- saving Skills about \$53,000 annually after all the required equipment is paid off.

Opportunities for Skills, Inc included, for the Chemical Finishing Line: increasing part hang time; reducing part withdraw rate; installing automatic timer on hose; and adding three new rinse tanks. For the Painting Line: using water filtration/recycler unit; purchasing automated gun washers; and establishing paint room lead.

Based on TREE recommendations, Skills has revamped their plating room, removing all of their plating tanks and refinished the room. This included sand blasting the walls and ceiling, painting, installing a new ventilation system, and resurfacing their sumps. They permanently removed their chromic acid plating line and rearranged their tanks to simplify the process flow. They have also greatly reduced the number of hand dipping of plating buckets.

Implementing TREE suggestions have helped them reduce their wastewater by approximately about 50% or 50,000 gallons per month and their hazardous paint waste from 15-18 drums per month to less than one drum per month.



The drag from one of Skills Inc.'s metal finishing tanks.

What are the benefits of TREE?

The TREE Team can help to incorporate or “engineer” efficiency into your business model:

Businesses are now facing increasing costs for water, energy, hazardous waste disposal, and waste treatment, increasing financial burdens to a business. Engineering efficiency in your industrial process can minimize these financial burdens. By incorporating less wasteful operations methods today, you can eliminate costly and hazardous by-products for the future, saving natural resources and increasing your competitive edge.

Other benefits may include: lessening liability or complex regulation due to current or future public environmental concerns; improvement in worker's safety and satisfaction; enhancing your public relations.

TREE Program Recognition:

The success of this team has not gone unnoticed. The TREE team was given the Governor's Award for Service & Quality Improvement in 1998 and was also recognized by Governor Gary Locke in the July 1999 “Governing for Results” report.

Charlie Harris, Skills' Chief Executive Officer, stated, “Using the TREE report, we redesigned and reconfigured our entire anodize building and operations with the specific goal of reducing resource utilization. The visibility of the TREE team during their visits and the resulting efficiencies of the finishing processes have motivated the operators of the facility to consider each action with an eye for resource conservation.”

Industrial Waste fees are set for 2004

Fees charged industrial users for the types of waste they discharge to the sewer system recover approximately 50% of the KCIW budget; the King County sewage-treatment fee pays for the rest.

Each year, KCIW reviews all of the fees shown in the table below. Our intent is to recover just what it costs to operate the fee programs listed in the table.

KCIW staff maintains efficient operations to keep fees at the lowest possible level. (In 2004 we succeeded in keeping all fees except heavy metals the same or lower than 2003.) Monitoring fees are set by dividing costs that have to be recovered by the total industrial volume. While in 2003 the volume that heavy metals companies discharged decreased significantly, the number of companies discharging remained relatively constant, as did our costs to continue to inspect and collect samples from these companies, per our federal regulations. As a result, we were forced to almost double the heavy metals fees. Because we are concerned about the impact of

these fees on companies, we plan to review the fees again in June of this year.

We recover the costs for treating high-strength wastewater by applying a surcharge to wastes that have a biochemical oxygen demand greater than 300 mg/l and total suspended solids greater than 400 mg/l. The surcharge includes an administrative charge that recovers costs of sampling, analysis, inspection, and billing high-strength dischargers.

When we recover costs for monitoring discharges for heavy metals and fats, oils, and grease, the charges recover all costs of inspecting and sampling companies with such discharges.

The post-violation program is designed to recover inspection and monitoring costs from out-of-compliance facilities. Because violating companies require more attention than companies in compliance, post-violation fees put the economic burden on companies that cause the extra costs.

KCIW also recovers costs for inspecting and drafting permits and discharge authorizations.

The unit charges of fees shown on the table are affected by several factors, including the following year's predicted expenditures and the previous year's actual expenditures.

A Comparison of 2003 with 2004 Fees

	2003 Fees	2004 Fees
High Strength Surcharge		
Biochemical Oxygen Demand (BOD)	\$0.176434/pound	\$0.122536/pound
Total Suspended Solids (TSS)	\$0.258323/pound	\$0.196758/pound
Monitoring Charges		
Heavy Metals	\$0.001272/gallon	\$0.002291/gallon
Fats, Oils, and Grease	\$0.000195/gallon	\$0.000182/gallon
Permit Fees		
Waste Discharge Permit	\$1,885.00	\$1,615.00
Discharge Authorization		
Major—New	\$1,335.00	\$1,045.00
Major—Renewal	\$1,335.00	\$1,045.00
Minor—New	\$690.00	\$465.00
Minor—Renewal	\$690.00	\$465.00
Letter of Authorization	\$130.00	\$125.00
Post Violation Fees		
Metals Grab	\$130.00	\$130.00
Metals Composite	\$250.00	\$250.00
pH Grab	\$120.00	\$120.00
pH Continuous (Installation)	\$100.00	\$100.00
pH Continuous (Per Week of Operation)	\$100.00	\$100.00
FOG Set	\$320.00	\$320.00
VOA Grab	\$270.00	\$270.00
VOA Composite	\$390.00	\$390.00
BNA Grab	\$415.00	\$415.00
BNA Composite	\$535.00	\$530.00
Cyanide Grab	\$155.00	\$155.00
Cyanide Composite	\$275.00	\$270.00
Mercury Grab	\$140.00	\$140.00
Mercury Composite	\$260.00	\$260.00
BOD	\$280.00	\$275.00
TSS	\$250.00	\$250.00
Enforcement Write-Up No Further Action	\$225.00	\$225.00
Enforcement Action	\$620.00	\$500.00
Inspection	\$225.00	\$175.00

Publication of recent enforcement actions

King County's Industrial Waste Program is responsible for making sure that water used by County industries returns to our waterways clean and safe. This protects our water resources, our public health, workers at treatment plants, and the biosolids produced there.

The vast majority of King County's businesses do an excellent job of meeting these clean water goals by treating their industrial wastewater before they discharge it to the sewer. Whenever possible, we work to provide technical assistance and help industries reach compliance before enforcement actions become necessary. If companies violate clean water standards, however, we do take enforcement actions, as federal regulations require.

The following companies are users of the County sewer system that violated treatment requirements between December 2003 and February 2004 (or have not had their violations previously published) and either:

- were found in significant non-compliance during the reporting period; and/or
- received fines, and/or
- had violations that were unique or warranted special attention.

Arctic Ice Cream Novelties **1901-23rd Avenue South** **Seattle, Washington 98144**

Nature of Violation/ Type of Pollutant: Permit violations: (1) Failure to adequately maintain and operate all treatment or control facilities or systems to achieve compliance; and (2) Failure to continue to operate the current in-line pH neutralization system.

Basis for Publication: Violation warranting penalty.

Comments: Arctic Ice Cream is under a King County Compliance Order to install a new approved pretreatment system by March 15, 2004. Arctic Ice Cream has made some revisions to the current pH neutralization system to improve compliance with discharge limits until the new pretreatment system is installed. In addition, Arctic Ice Cream has made administrative changes to improve personnel accountability.

Penalty: \$10,000 fine, \$845 post-violation charge and compliance schedule.

Fujicolor Processing, Inc. **770 Andover Park East** **Tukwila, Washington 98188**

Nature of Violation/ Type of Pollutant: Permit violations: (1) Failure to notify King County within 24-hours when self-monitoring data showed a violation (2) Failure to submit a written report within 14 days of becoming aware of each violation; (3) Failure to report all self-monitoring sampling data analyzed by approved methods; and (4) Submission of falsified self-monitoring reports. Discharge violations: 17 violations of the daily average silver limit, which occurred from February 26, 1998 through January 11, 2001.

Basis for Publication: (1) Violation warranting penalty; (2) Failure to accurately report non-compliance; and (3) Settlement Agreement of December 30, 2003.

Comments: This action was achieved through a settlement agreement with Fujicolor Processing, Inc. The acceptance of this settlement agreement by Fujicolor does not constitute the admission of any act of falsification. Fujicolor voluntarily self-reported violations to King County; independently initiated a program of environmental process improvements intended to ensure continuing compliance; and has cooperated in the resolution of this action. King County also revokes the Industrial Waste Program Silver Awards for 2000 and 2001 given to Fujicolor Processing Inc. The company's discharge and permit violations found to occur during those years make Fujicolor ineligible to receive these awards.

Penalty: \$109,000 fine plus \$7,500 in avoided costs, \$2,825 post-violation charge and compliance schedule.

Other Enforcement Actions: King County Industrial Waste also acted on 11 other violations at nine companies for the following pollutants and/or parameters: cadmium (1); dissolved sulfide (1); late report (5); lead (1); and pH-Acidic (3).

We all need to work together to prevent pollution. If you have information for the Industrial Waste Program or questions about our programs, please call (206) 263-3032 or 711, TTY Relay Service. You may also visit our program's pages at <http://dnr.metrokc.gov/wlr/indwaste/index.htm> on the Internet.



February IWAC Meeting & Tour of North Creek Analytical Laboratory

Board member Scott Woerman hosted the meeting and gave a tour of the North Creek Analytical Laboratory. (see page 2.)

This information is available on advance request in accessible formats for persons with disabilities. Please call 206-263-3000 or TTY relay service at 1-800-833-6388.

Printed on recycled paper

40173dh1.p65



Wastewater Treatment Division
Industrial Waste Program
130 Nickerson Street, Suite 200
Seattle, WA 98109-1658

PRSRT STD
U.S. POSTAGE
PAID
SEATTLE, WA
PERMIT NO. 01605

RETURN SERVICE REQUESTED